Webinar Transcript

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What You Need to Know About the Verification Process
September 3, 2020

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0:06

Speaker 1 - Good afternoon everybody, and welcome to the State Department of Education's, what you need to know about the Verification Process. I'm Shannon Yearwood very proudly here with my team for our school nutrition programs. Today we have Teri Dandeneau, Fionnuala Brown and Susan Alston, who will be presenting on everything that you need to know about verification. Last week you joined us for the Income Eligibility Application Workshop, but it's very intense packed with information and now we're, now that you know what you need to do to collect those and process them, now, we're going to teach you what you need to do to verify those.

0:48

We have a very packed agenda, we encourage you to please enter your questions as we go into the question box. It is unlikely we will be able to have time to answer those during the presentation, but what we have decided, we will do is take those questions were able to extract them from our GoTo webinar platform. We will type in the answers, and then when we make the recording and the transcript available, we will also make those questions and answers available to you to help you guide you through this process. We hope that's going to be a helpful strategy as you work through this very intense information. The other thing I want to just mention very briefly is this year, being a very strange year indeed, for the Child Nutrition Programs and for school nutrition operators.

1:37

I know on this past Monday we had some announcements out of USDA that created some flexibilities that we are working to be able to implement here in Connecticut, around being able to operate the Summer Food Service Program and Seamless Summer Option of the National School Lunch Program, during the school year, up through December 31st, we hope to have those materials available to you to opt into that sooner than later, we're still working on trying to get some guidance. Please, what I encourage you is whether or not your district is considering trying to move forward with one of those programs, do not think that that means you do not need to process these applications and do the verification now. Now, more than ever, is the month that you want to make sure that you are getting as many of these applications and verifying them accordingly, so you're ready to pivot, you're ready to run with the programs as they are the School Breakfast School Lunch programs.

2:34

And to make sure that the children in your district that you're serving in your schools under your sponsorship agreement have access to the benefit levels for these meal programs that they are eligible for.

2:46

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With that, I know I spoke like an auctioneer. I was trying not to take too much time but I will hand it off to our team and don't forget there'll be a transcript. So if you did not understand what I said, you'll be able to read it in your own time. Thank you.

3:00

Speaker 2 - Thanks Shannon. I do want to let you know that the PowerPoint presentation and handouts are available, and you should see them up on the screen, so that way you can get them and then download them and print them off if that's how you want to look at them.

3:16

If you have a bad connection, you may want to turn off your VPN and go to will still function as Shannon indicated, you want to make sure that if you ask what you have, any questions, that you type them in, so that way, if we don't get them to get to them today, we'll be able to address them, and then send them all to all of the attendees, and this workshop will be recorded. We already did the introductions, and thank you Shannon, for doing that.

3:44

And so we're going to get started right with the presentation, and one of the things that I want to point out is that you want to make sure that you have access to the eligibility manual for school meals. And this is a very important manual that not only goes over the verification process, but it also goes over the application certification process as well. You can find this on our website, and the latest version is July 18th of 2017, and I also want to let you know, we're going to be turning off our webcam, so that way, you won't be seeing us individually until the end.

4:37

Verification, this is, while you're here today, and it's the confirmation of income, first, for a small percentage of households approved for free or reduced price meals each school year.

4:50

If you process applications, and LEA stands for a Local Education Agency, and verification is required.

4:59

Alternate Provision Schools, such as Provision Two schools, which we don't currently have in Connecticut, and CEP schools, do not conduct verification and that's one of the benefits for being an alternate provision school.

5:16

USDA requires that sponsors conduct verification, basing their selection on the total number of new applications approved by October 1st and that's the big date market on your calendar, and this is known as the sample pool, and that's, those are those applications that have the potential to be selected.

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5:41

One of the things that you may come across when you're doing the verification process is mixed households, and those are households that include children designated as other source categorically eligible, such as being head start, they're enrolled in a federally funded head start program or a state funded head start program that has more stringent income requirements.

6:02

They are homeless and determined to be homeless by the district's homeless liaison or runaway, and they're also determined by the homeless liaison, as well as other children who are not in this group, okay. So, these would be households that might have some of these children in that category, and these applications should be part of the verification sample pool and may be selected for verification.

6:31

Must be completed by November 15th. Verification, um USDA requires that verification be done by November 15th and what that means is, is all of the final letters are issued to the households and the final determinations are made.

6:48

Note that this does not mean that a child's change ineligibility occurs by November 15th, because you need to give if you're notifying the household, you need to give them a list certain amount of time in order to make the changes, but you want those final letters to go out by November 15th, so you want to mark that on your calendar as well.

7:11

Now, we went over this and if some of you were on the application certification training last week, this slide is very familiar to you, but it's important that people who are doing the verification process understand the differences in these positions.

7:25

Because you all work hand in hand and that is a determining official. This person is the person who approves the free and reduced meal applications and that's what's known as a Determining Official.

7:36

The Verifying Official is the person who is designated to conduct the verification process for the district, and you select the households that are going to be verified as well.

7:48

Then, you have the Direct Certification Contact, and that's the person who was designated to have access to the Direct Certification Web application page. There should only be one Direct Certification contact per district.

8:05

Then you have the Hearing Officer, and this is the person who is designated to conduct a fair hearing if a parent or guardian requests it, and this cannot be the same person as the determining official or the verifying official.

8:19

It usually is somebody, an administrator for the program, somebody like the principal or the superintendent or the deputy superintendent. It doesn't necessarily have to be those titles, but often it is.

8:32

And their responsibility is as if a parent does not agree with the verifying officials, determination of the verification process, then the parent has the right to file a fair hearing with a hearing officer if they wish to do so, and so that's why you need to have a hearing officer, and you need to know who it is.

9:00

Now, it's also important to know the difference in days, because these are referred to in the eligibility manual guidance frequently, and the process for conducting verification is outlined in detail in the eligibility manual guidance. We're only doing an overview of it right now, so for details, you definitely want to review that section on conducting the verification process.

9:25

So, one of the days that are important are Operating Days, and these are days in which a meal or milk is provided to child.

9:37

Then you have Calendar Days, and this is the number of days represented on the calendar, and then you have Working Days, and these are days when school is open and teachers or school administrators are on site that the reimbursable meal services is not in operation. It's important to know the difference.

10:03

Now, Direct Certification, I mentioned the Direct Certification contact, and if you're new to the verification process, you may not be familiar with Direct Certification.

10:12

But children who are directly certified, they do not need to submit an application, and they are not subject to the verification process.

10:20

So the benefit of direct certification, when it comes to verification, is that it helps to lessen the pool of households that you have to verify, or that have to be part of the sample pool, and that lessors the number of houses that are going to be verified.

10:36

So, it's really important that the determining official work with the Direct Certification contact and you, to make sure, as many children eligible are directly certified in a timely manner.

10:50

And there's different ways that a child may be directly certified, and this outlines some of the different codes that are on the Direct Certification List.

11:00

So, basically, Direct Certification is when the State Department of Education communicates with the Department of Social Services on a weekly basis, their student database to determine those students that are determined to be eligible for free or reduced price meals based on these different codes. So, one of the codes is SFS, and that stands for SNAP benefits, meaning the child is receiving SNAP benefits.

11:27

And in this case, free eligibility extends to all children in the household, then you have the Code of AF, which is Temporary Family Assistance TFA, and again, these free benefits extend to all children in the household.

11:42

Then you have OT, and in this case, that stands for Other, and this would represent foster children who are directly certified and automatically eligible for free meals.

11:54

But in this case, the benefit eligibility does not extend to all children in the household.

12:00

And when it comes to foster children, this is a, you can have situations where foster children are directly certified, you can also have situations where foster children are checked off on a free and reduced meal application, which is not a case of direct certification.

12:18

And they may be subject to the verification process, because a state agency is not involved in determining whether or not they are automatically eligible for free meals when an application is submitted.

12:31

Okay, so it's important that you know that distinction, and in this case, with foster children, the State Department of Education communicates with the Department of Children and Family Services, not DSS, the Department of Social Services. And then you have FM which is Free Medicaid, and this is free eligibilities that extends to all children in the household, and then you have Reduced Medicaid, which is reduced price eligibility extends to all children in the household.

13:00

For the purposes of verification, the determining official must track the differences, and you're going to find out why, in a few slides when we talk about the verification collection report.

13:12

Now, Direct Certification, a child can also be directly certified by the Homeless Liaison, and the homeless liaison needs to provide the determining official with an updated list of all students that are homeless or runaway, and the list must be signed and dated by the Homeless liaison.

13:30

An e-mail from the homeless liaison is okay to receive, and every district is expected to have a homeless liaison, and also the Director of a federally funded or state funded program that has the same or more stringent requirements district's Head Start program, those children can also be considered to be directly certified.

13:53

And so the director of that Head Start program will provide the determining official with a list of students that are enrolled in that head start program, and all of those children are eligible for free meals, but that eligibility does not extend to other children in the household. The list must be signed and dated.

14:16

The guardian or school provides the determining official where the current DCF 603 form from a state agency, and that 603 form, and it must be from the current school year would demonstrate that a child is indeed a foster child. That would be direct certification because it on state agencies letterhead, and which show that that child is a foster child, and in that case, a foster child would not be subject to the verification process.

14:45

Then there's also something known as the LEA's point of contact for foster children, and that many times, it's the homeless liaison, but they can also tell you if a child is a foster child, and so, if you get that list from your LEA point of contact for foster children that those children would not be subject to Direct Certification.

15:10

Now, there's something known as Direct Verification and many times sponsors get confused when they complete the Verification Collection report.

15:20

And they said, yes, they did direct verification when they think that they're, they did direct verification, but they're confusing the term with Direct Certification.

15:30

And Direct Verification is when you use records from public agencies to verify income or program participation.

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15:39

And again, it's not the same as Direct Certification, which is determining children eligible for free meal benefits based on documentation and obtained from a state agency. So most districts in Connecticut do not do direct verification, and please remember that because you will be asked that question on the verification collection report and you'll want to check off no, just remember that the answer is no.

16:10

Now, on our website, all of the verification forms can be found, they've been updated. So if you're ever looking for something, you would go to program guidance, and you would click on V and it would take you down, actually you would go to forms, and it would take you down to, and go and click on V, and it will take you down to the verification forms if you're looking for anything.

16:33

Now there's different types of verification that you can select, and again, this is in the eligibility manual, guidance in much more detail, but one is standard sample size, two is alternate one, and you all see also see a reference to alternate two, which is not applicable in Connecticut. So no one should be selecting alternate, two.

16:55

Standard sample size is 3% of all new approved applications on file October 1st from Error Prone applications, okay.

17:07

And Error Prone are those applications that listed a household income within $100 a month, or $1,200 a year, of the Free and Reduced Income eligibility guidelines.

17:19

And so if you have some information where it involves SNAP, TFA, Homeless, Runaway, or Head Start applications they are not considered to be error prone, ever.

17:32

So how do you figure out error prone if the household checked off two times a month, or biweekly, and this is more for the determining official but it's important for you to know, and this gives you some guidance and how you would determine error prone. Because when you are looking at the applications to select, you need to make sure that they're error prone, okay.

17:56

If you have to do standard sample size, so that leads me to this slide, which says, how do you know if you must do standard sample size verification?

18:06

Well, if you had a non-response rate in the prior school year of 20% or more, then you must do standard size sample, standard size verification, okay. How do you know if you exceeded 20% or

more? You have to look at last year's verification collection report, which is in the Child Nutrition Program online system.

18:30

So, and then you have to take a look at it and you would have to calculate, did you exceed the 20%, and if you did, then you know you have to track error prone and you have to do standard sample size verification.

18:47

And this is a snapshot of the um of a section of the Verification Collection for Report, also known as the FNS 742, and in this example, you can see, this is one where was already completed, this district, they verified a total of two applications, okay if you look in column B, there's one application, column C has one application, and then they had one application where the household was eligible for free meals originally based on income, but when they responded, and the verifying official looked at the documentation that was provided, they saw that they had to be changed to reduced, because the documentation didn't support free income.

19:40

So, they had one application that changed, went from free to reduced, and then they had another application that responded, and they changed to paid, okay, that did not respond, and they changed to pay, okay, so in this instance, there's a 50% non-response rate and that would make them you would have to do look at look at error prone applications.

20:10

Okay, here's an example of where you had two applications that were submitted or selected for verification, they both responded, there was a change for one of them, the other one had no change, so they didn't have a non-response rate, and so, therefore, they do not have to do, or look at error prone applications and they can pick the type of verification they want to do.

20:36

Now, if your non-response rate is less than 20%, you can do alternate one. You can also do standard sample size, but you can do error. You can also do alternate one, and this is the sample sampling size is 3% of all newly approved applications on file, on October 1st.

20:54

They must be selected at random, and you always round up. So you're not doing error prone applications when you do alternate one. I want you to remember that you may not verify more than the sample size.

21:11

Okay, if you if your sample size is six, you cannot verify seven just to be on the safe side, okay, and remember to always round up.

21:24

Now one of the handouts that we have attached is the calendar for completing verification.

21:30

You want to make sure that you take a look at this, print it off, mark it on your calendar, refer to it, it gives you guidance on timeframes for how to complete the verification process.

21:42

And so, it really is a handy tool, I think for you to use, and I give you the link so that way, you can also go to the website to find it.

21:54

And by the way, also included are, your, in the handouts, is a copy of this PowerPoint presentation.

22:02

Now, we have something known as Verification for Cause, and the LEA has an obligation to verify all approved applications that may be questionable, and that's known as verification for cause.

22:16

For details, you want to refer to page 99 and the eligibility manual for school meals. It's not considered part of the normal verification process, it's separate from it.

22:27

However, you have to track uh the process and the responses, because you're going to need to report verification for costs separately when it comes to reporting on the verification collection report.

22:45

Now, you need to remember that verification efforts cannot delay the approval of applications. If an application is complete, and indicates that a child is eligible for free or reduced price meals, um the application must be approved and processed, and it's only after you determine that application, that you can begin the verification process, and that is for verification for cause.

23:12

Prior to certifying children for benefits the determining official should review the application for any discrepancies in the information provided.

23:21

So, really, when the determining official is looking at the application, if there's any questions or anything, know, you have the right to contact the person who signed the application to get clarification, you don't want to wait until it gets it, if it's selected for verification, because that will help the verifying official, make sure that everything's in order before they actually look at those applications.

23:44

And if the determining official finds a discrepancy, they should seek clarification about the information provided. And you want to make the determination in a timely manner, deny the application with an explanation that it was incomplete, and then approve or approve, approve the application, excuse me, and verify it for cause.

24:05

Determining Officials are strongly encouraged to contact the household during the certification process, that's the process for approving the applications, to clarify any information that's questionable, okay, and you want to do that before proceeding with the verification, and any kind of verification for cause.

24:24

And then, um, once you contact a household to do verification for cause, you have to complete the whole process. You can't in the middle say, well, you know, I don't think I'm going to finish this, or it's not important to finish it, you have to finish the whole process, and USDA supports the use of verification for cause to help with the integrity of the program.

24:51

Now, what do you do if you have an application with no income? Well, if a household is selected for regular verification or verification for cause, and the application indicates zero income.

25:02

The LEA must request an explanation of how living expenses are met and may request additional written documentation or collateral contacts.

25:11

So, those applications that have zero income are part of the verification process and may be selected randomly to be verified, and this is how you would go about verifying a zero income application.

25:26

The collateral contact may be asked to document the duration and type of assistance that is provided to the household.

25:34

Second notices, very important, the district must issue a second notice if a household fails to respond to the verification process, and this is required by USDA.

25:50

Now, one of the other handouts that's provided is the Sample Verification Selection Worksheet, and this is a tool for every household that you're selecting for verification.

26:01

You want to print off one of these sheets, and this is going to be your starting tool, and you want to fill it out and make sure that you complete it in full.

26:09

This is something that really tells the story about the verification process for each household that was selected, and it's important that you um, you make the changes and indicate them on here, if there are any changes, and that you sign it, and that you date it, because it becomes part of their record. Again, you can find this underneath the verification forms on the State Department of Education's website.

26:38

Now extensions, extensions are rare, but they do happen occasionally. The Local Education Agency may request an extension of that, of the November 15th deadline date for verification, in writing from the Superintendent to the State Department of Education, and the request must be received by the close of business on November 1st.

27:01

And The State Department of Education May approve in writing an extension up to December 15th of the current school year, due to a Natural Disaster or Civil Disorder, Strike or other circumstances that prevent the LEA from the timely completion of verification activities, okay.

27:21

Um, it's, it's really important um that you do everything you can to get verification done by November 15th, but we know that sometimes there are circumstances that happen that don't allow you to do that, and so we do give you a November 1st deadline date, and we just want you to know that verification extensions are not taken lightly, and corrective action plan must be submitted along with the extension request.

27:54

Now, all verification forms are on the State Department of Education website, as I indicated.

28:00

Any notification of adverse action must contain a fair hearing language and the parent guardian's right to appeal instructions on those forms, okay, and our forms that we provide have everything you need. So make sure that you take a look at them and use them as much as possible.

28:21

Okay, if you have a computerized system that is generating the verification forms for you, you need to print them off, compare them to our forms, and make sure they have all of the required components.

28:36

So the next thing I'm going to talk about is the Verification Collection Report, which is the FNS 742. This must be completed and submitted online by December 15th.

28:51

The form that USDA has provided is also a handout for you to take a look at when you get a chance. I'm going to give you a snapshot of each section of the form and go through it.

29:05

Um, basically, the first section is probably the easiest section for you to complete, um all sponsors, even if you don't have to do verification, have to complete this form.

29:17

And USDA uses the information to actually set policy. So the data that's on this form is very, very important, and it's important that it's accurate, okay. So, on the first section, you just fill out your name and by name, the State Agency, of course, the Connecticut State Department of Education, but the SFA name is your school district, or if you're an individual school, it's the name of your school. It's not you who's completing the form, okay. If your public or non-profit, private, you would check it off the school year would be this school year, 2020 to 2021.

29:53

Section one - Total Schools, Residential Child Care Institutions and enrolled students. So all SFA's School Food authorities must report Section one.

30:04

And so if Total Schools don't include RCCI so you would list the number of schools or institutions and the number of students enrolled in those schools or institutions. It's only schools, this is really important, write this down.

30:19

It's only schools that participate in the National School Lunch Program or Breakfast Program, and it's only students that have access to the National School Lunch or Breakfast Programs, okay.

30:34

So if you have split day kindergarten students who do not have access to breakfast or lunch, then you would not include them in the enrollment. If you have a high school that doesn't participate in the National School Lunch Program, then you would not include them in the number of schools, alright.

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30:50

Then if you're an RCCI, and you're collecting applications because you have day students, then you would fill out the rest, okay. You would only report day students, and not many RCCI's have day students, if they do have day students and collect applications, many of them just use a Direct Certification website.

31:12

So, this is what it's going to look like on the Child Nutrition Program website looks a little bit different, but same information. So, I suggest you use the paper form and then transfer that information onto the website.

31:30

Section two is, um, SFA's with schools with operating alternate provisions and Alternate Provisions in Connecticut means currently the community eligibility provision.

31:43

And one of the things that I didn't mention in the previous slides, was that the number of schools and institutions under the two columns, you're going to see two different days of reporting sometimes, so it will say as of the last operating day in October, so that's when you're supposed to report the data for in this case for both the number of schools and institutions and the number of students, okay, remember that in the paper USDA FNS 742 handout, it gives you the instructions on how to complete all of this, so you can always refer to that as well.

32:18

So um we don't have any Provision, 2 or 3, so you would X out all of that and when it comes down to 2-3 operating the Community Eligibility option, it would be the number of schools that are doing that, and the number of students enrolled in those schools that are operating CEP and then operating other alternatives for the NSLP, you would include that there as well, okay, but again, we don't have any other alternatives. This is what it looks like in the Child Nutrition Program online system.

32:52

So section three is a very important section, and this is students approved as free eligible, who are not subject to verification, remember that, okay.

33:02

So, uh 3-1 is you check the box only if schools and or RCCI's and the SFA were not required to perform direct certification with SNAP.

33:14

So, um, all of you, unless you're 100% CEP, have to do Direct Certification, so you're not going to be checking off 3-1. 3-2 are students directly certified through SNAP, do not include students certified with SNAP through the letter method, and that's of the last operating day in October,

okay, so this would be coded as SFS on the Direct Certification list, and that's where you're going to be putting those students.

33:45

3-3 are students directly certified through other programs, and again, it says, at the last operating day in October, and these are students that are directly certified through TFA, and I'll point out that USDA references TANF, but for Connecticut its TFA and it's the same thing. We do not have a food distribution program on Indian reservations.

34:10

So that, it doesn't refer to us and Medicaid if applicable, and that does apply in Connecticut, and those that are documented as homeless, migrant, runaway, foster, head start, pre K and even start, or non applicant, but approved by local officials. You do not record SNAP eligible students and 3-2, okay. Now, I'm not going to spend a lot of time at 3-3 because I'm going to show you the next slide, which is going to break it down for you.

34:39

And 3-4 are students, certified category three, through the SNAP letter method. So if a determining official has contacted a household because the household listed a hand-written case number on the application, and the household provided a letter directly from DSS on DSS letterhead for the current school year, and it referenced income on that letter, then that letter is Direct Certification and it would be listed here in 3-4.

35:13

Okay, now, Connecticut's section three looks different and that's because we made some changes last year, and that's for reporting purposes for us, and uh so I just wanted to go over that with you because I don't want it to be too confusing.

35:32

And again, um you know 3-1 you won't be checking unless you are a 100% CEP school and not collecting applications or an RCCI, but for 3-2 students directly certified through SNAP benefits, okay, you're going to all, these are only students that are FS, okay, on the Direct Certification List and refer to the previous slide for the reference times last operating day in October and then what we did is in 3-3, we broke it down.

36:01

So, we have A is Temporary Family Assistance, that's AF on the Direct Certification list, so, you're going to be separating out those students that are AF.

36:12

Free Medicaid, those are students that are FM on the direct certification list. You do not include Reduce Medicaid here, okay, and then C other, which is homeless, foster, head start, it's actually OT on the Direct Certification List. So anybody that's categorized on the direct certification list as OT would be listed in that box.

36:32

Then we have 3-4 which our students certified categorically free through the SNAP letter methods.

36:40

So those are the letters that you would put and we have 3-5, those that are approved as reduced Medicaid, which is new.

36:48

You won't see that on USDA's form so we're tracking who you are directly certifying based on Reduced Medicaid and you would list that there and those are RM on the direct certification list.

37:04

Now, I mentioned that Letters from DSS supporting the receipt of Temporary Family Assistance benefits that are submitted by the household are considered Direct Certification, however, USDA says that they must be conducted using an automated data match process.

37:20

So, if a household provides a SNAP eligibility letter to the, determining official, the letter must be used to establish eligibility, but it's not considered Direct Certification for reporting purposes, okay.

37:32

So, that's why you can include them in the, in the beginning, should have said SNAP, but you have to include them in the specific area, and the letter area, the area that says letters, okay, for those instances.

37:46

Now, section four are all of the income applications that you receive, okay, and these are the applications that are subject to the verification process, and you're going to notice two different reporting times. A, the number of applications is as of October 1st and the number of students is as of the last operating day in October, and this is the way USDA wants it. I'm not sure why, that's how they required it since we started doing the FNS 742.

38:13

So 4-1 you would approve as categorically free eligible. You would list the number of applications and the number of students. 4-2 that's approve free reduced eligible applications, and that's based on household size and income.

38:28

Then, 4-3 is reduced income applications, and they would be reported accordingly, the system automatically populates the information for you, so you don't have to do T1 one or T2, and this is what it looks like in the system.

38:48

Section five helps to tell the story of how you did the verification process. So, 5-1 dash 1 checks the box of all schools in RCCI's are exempt from verification. Well, you're not exempt for verification unless you're 100% CEP.

39:04

So you do need to fill this out, or if you're in RCCI that doesn't collect applications, so we want to see that you completed the process by November 15th.

39:15

If you've completed it after November 15th or if you did not do it at all, and if you did not do it at all, you're going to be required to submit a corrective action plan, okay, and that's very serious if you didn't do verification at all. And then we want to know the type of verification that you did.

39:33

Remember, Connecticut does not allow Alternate two, so you're only going to be selecting, standard or alternate one.

39:41

Then the next section, if, if 1 or 3 is checked and if 5-3, which is standard, or alternate two, and it won't be alternate two, then you need to fill out 5-4, because you're going to be looking at error prone applications.

39:56

So USDA wants to see all of the error prone applications you had on file October 1st, and you have to report it, then 5-5 are the number of applications selected for the verification sample.

40:11

Now earlier in 5-6, I talked about direct verification, all of you are going to be checking the box here.

40:20

Check the box if direct verification was not conducted, so, 5-6, check the box, and then you won't be putting in anything for A or B.

40:31

Now, the FS total applications in Column a Section four times 3% is not, this is the number-one issue that I see when I look at the verification collection reports.

40:45

Is that the total number of applications in Column A section 4 times three does not support the total number of applications selected for the verification, Section 5-5.

40:56

And what this means is, is that when you go to section four, and you list the number of applications, and you total it up, and you multiply it by 3%, because that's going to be your verification sample, it does not equal what you put in Section 5 and 5-5.

41:17

And if that happens, it's a flag, and you may be getting a phone call, okay, so those numbers have to match, and also, you want, here's an example, the total number of applications in Section four, were 84, if you take 84 times 3%, and equals to zero point five to your rounded up to three. Not, four applications, to verify. And yet this person for whatever reason, selected for applications.

41:46

And then you'll be getting a phone call, saying, what's going on? Why did that happen? And we will need clarification.

41:55

The verifying official must check to ensure that the correct sample size is used, especially if the computer selects the sample. You need to know how the software did a selection. You can't assume. If we do an audit of that information during an administrative review, we're going to ask you, we want to see behind the scenes, how is your system doing the verification process, and we need to see all of the documentation for that.

42:22

Now, Section five in the online system, says, it says that, it tells us whether or not you completed the verification in a timely manner, okay, and this is what it looks like in our system, compared to what it looked like on the paper verification form, and here in section five is how you report your results of verification. If there were any changes.

42:50

Um, I do want to point out that DC one is where you would report your applications that were verified for cause, and don't forget that if you've verified any applications for cause by November 15th, you list them here, and then the results get listed as well in 5-8, and that's very important, and this is what it looks like in the online system.

43:21

So um, the submission of corrective action will be required if verification was not done by November 15th, or if it wasn't completed at all.

43:32

You will see that there's areas where it says add that will show you how to add your corrective action documents.

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43:40

You get any errors, you can't just ignore them and you need to make sure that you address those errors if they do come up and just read and it will tell you the area that you need to go to in order to address those errors, okay.

43:58

Now, if a parent submits a letter as proof on DSS letterhead and it states the parent or someone in the household is receiving SNAP or TFA. How does this get recorded well for SNAP, It kind of get recorded in 3-4, okay, and if the determining official confirms that that child is actually on the direct certification list, then it would be in 3-2.

44:27

Remember that anything recorded in Section three of the FNS 742 is not subject to verification.

44:34

Therefore, applications with hand-written case numbers that were confirmed, would not be subject to the formal verification process because they found that child on the Direct Certification List.

44:49

Now, some important points to remember. You must document and you must conduct, a confirmation review on all selected applications for verification and this has to be completed by somebody other than the determining official.

45:06

Alright, so, if you, if the determining official and verifying official are the same person, then you need to find someone else to do the confirmation review, such as a Business administrator, who may be familiar with the whole process, okay.

45:21

And it has to be documented and on that selection worksheet that I mentioned earlier, it gives you an area to document who did the confirmation review and the date that it was done. You want to make sure you document everything, um when you speak to the person who signed the application, to get to answer questions regarding the verification process, or whoever sent you that documentation.

45:46

You can talk to them, you document what you spoke to and the date, always round up, and keep copies of everything.

45:57

Remember to verify all income, including child support, and do not take their word for it, especially if they are self-employed.

46:05

Only the case number may be used to determine eligibility. For example, a copy of the Connect Card, or Electronic Benefit Transfer EBT card would never, we can't accept, and if the household does not respond to the verification process, the verification is considered complete the household when the notice of adverse action is set.

46:28

Now, if the household indicates verbally or in writing that it no longer wishes to receive free or reduced price benefits, verification is considered complete when the notice of adverse action is sent.

46:40

If a household does not respond, or a parent indicates they do not wish to participate, then document it, and send a letter of an adverse action.

46:49

And remember that all households have the right to a fair hearing, and this wording must be in your letters of adverse action to the households.

46:58

If a household fails to respond to the verification process and has changed to deny, and then re-applies later in the school year, and this sometimes happens through application would be considered incomplete until their application was verified by the district, okay.

47:15

So, a couple of months down the road, they may submit a new application, and then you see that you have to verify it before you can approve that application.

47:25

And you would go through the formal verification process to do it, even if it was, after November 15th that occurred in May or February.

47:37

Hearing procedures that they ever do request a fair hearing, and you're hearing officer wants to know, where are the hearing procedures? You look in your eligibility manual guidance, and that's on pages 57 to 58.

47:51

Now, Civil Rights. If a household files a civil rights complaint against the district, due to denial of meals as a result of adverse action, the verifying official must refer to the District's Civil Rights complaint procedures. Every district must have Civil Rights procedures that pertains specifically to the Child Nutrition Programs on file.

48:11

Human Resources may have civil rights procedures for their public school system, but it's different than child nutrition, okay. So, if you get a complaint, then you want to seek out your complaint procedures for your district.

48:25

And they may have a complaint, because they don't agree with the verifying official's determination of the verification process.

48:34

Okay, reminder, LEAs must ensure that communication with applicants, participants, and members of the public and companions with disabilities are as effective as communications for people without disabilities.

48:48

Providing auxiliary aids and services such as alternative formats, tape, text, audio recordings, braille materials, large print and sign language interpreters is also required, okay, and this, we talked about this during the training for application certification, it also applies for verification.

49:11

It's the responsibility of all sponsors to ensure program access for those with limited English proficiency.

49:19

LEP is defined as individuals who have limited ability to read, speak, write, or understand English. Reasonable steps must be taken to ensure meaningful access to program and activities, and here are some reasonable steps that you need to consider, one of which is to provide documents in a variety of languages.

49:41

Local Education agencies that fail to provide services to persons with LEP may be discriminating on the basis of national origin. So, you have to take the reasonable steps to assure meaningful access.

49:56

And, again, here are some, you want to take a look at these different factors such as the number LEP of key persons served, frequency that these persons are served and provide services on the importance of the services and the resources that are available and the costs. And you want to provide appropriate translations of verification materials and parent letters.

50:20

We have a host of resources available to you regarding Civil Rights, the FNS Instruction 113-1 gives you all of the federal guidance around all of this, okay. We also have translated forms and a link to that, which are translated by USDA, and we have some forms. We only have Spanish and English on the State Department of Education's website.

50:48

Now, I want to talk about Ameliorative action briefly. USDA requires that State agencies monitor the high change rate of a child's status as a result of verification, so we're doing that on an annual basis, and what USDA means is, for a high change rate, is what a child's eligibility goes from free to reduce, to reduce, reduce to deny, or reduce to denied.

51:09

Do, to income differences in the household or a failure, to respond to the verification process, and, who may get targeted? Local education agencies where 50% or more of the verified applications resulted in a reduction in status, or LEAs that had to verify more than five applications?

51:34

Okay, so, some of you received an e-mail from me indicating that you were being targeted for Ameliorative action, and encouraging you to attend the workshop last week on Application Certification and this one as well, okay. If you are, verifying less than five applications you will not be targeted for a mailer to the action.

51:57

These are the school districts that were targeted.

51:59

But I do want to point out that Manchester, Danbury, Torrington, and the Connecticut Technical High Schools are now doing 100% CEP, which means they will not be collecting free and reduced meal application, so they don't have to do the verification process. So that's one of the benefits of CEP.

52:21

So if you have been targeted, you want to make sure that you attend training, you double-check your calculations for sample size, especially if you're using a software program, because they make mistakes, too.

52:32

You follow up with a household and do a second notice, and you use foreign language translations whenever possible, so you get parents responding. You also must use direct certification to the fullest, and then consider starting verification early if possible, and USDA has always allowed rolling verification, but a couple of years ago, they provided guidance on it.

52:55

And, um, they basically, they did some research, and they found that by starting verification early, districts had an improved household response rate, and it saved time by decreasing the administrative burden because it spread the work out over time, okay, and especially for LEAs who had to verify large numbers of applications.

53:21

And so, they developed tools um to assist in the verification process and they also developed a methodology for doing the sampling which is outlined here, sampling frequency and sampling intervals, and a toolkit can be found by going to this website.

53:37

And it's quite comprehensive, and what I suggest is, if anybody is interested in doing rolling verification that you do, look at their webinar, it's excellent, um and it will give you some really good guidance if that's something that you're interested in doing. You're not required to do it, however.

53:55

So how long do we have to keep the paperwork, well you have to keep all your records and that's including the applications and the verification documents for a period of three years after the submission of the final date of final claim for the fiscal year, which they pertain.

54:16

And if there's any audits that are going on, you have to keep it longer until the audits are completed.

54:21

And for special provision schools CEP, you must keep your data to support the base year or the ISP, which is individualized student percentage, and you always want to check with your Board of Education and town to determine if they have record retention requirements that are more stringent, okay.

54:41

So, um, if you have any questions, I want to encourage you to reach out to your County Consultant, here's their information. We do have a few minutes to um answer some of the questions, and I'm going to come back on video, and if Fionnuala and Susan and Shannon want to come back on video as well, that would be awesome. Am I on video? Speaker 2 - You're not on video yet. Speaker 1 - Someday I will figure all of this out. Okay. Speaker 2 – There you are.

55:23

Speaker 2 - Okay, so Shannon do we have any questions or does everybody know everything about verification and they're all set?

55:33

Speaker 1 - Let me pop this out and let, my computer has decided not to like me very much right now. So we do have quite a few questions. Would you like me to start?

55:45

Speaker 2 - Sure, you can just start, and then whatever we don't get, we have about three minutes, and whatever we can't get to we will definitely respond um via e-mail.

55:56

Speaker 1 - Great, thank you. Question - So we are starting the year with Early Dismissals. Breakfast will be provided, but not Lunched. Are these days counted as an operating day?

56:07

Response – Speaker 2 - Any day that you are providing meals to children as an operating day.

56:13

Question – Speaker 1 - If a student is Reduce Medicaid submits an application and becomes free, are they exempt from verification?

56:23

Response – Speaker 2 - Okay, if a student is reduced Medicaid, of course, this is all in the timeframe before October 1st, and they submit an application in the free, if they submit an application, and they're eligible for free meals that would supersede their Reduced Medicaid status, because it's the higher benefit, and if it was prior to October 1st, they would be part of the sample pool and could be selected for verification.

56:53

Question – Speaker 1 - Zero income applications are not within the error prone calculation category, so how do they ever get selected for verification, if we are doing a standard sampling?

57:08

Response – Speaker 2 - They may not get selected, but remember that you're not expected to verify for cause all temporary, not temporary, all zero, application, income applications, you're not expected to do that, but if you have reason to believe that there's an issue, you have the right to verify for cause.

57:32

Question – Speaker 1 - And what do you do if you have to do a sample size, but have no error prone applications?

57:40

Response – Speaker 2 - You would document that you don't have any error prone applications, and then you would just proceed with a 3%.

Speaker 1 – okay great.

Speaker 2 - By the way, can I mention something, Shannon? Speaker 1 – of course.

57:50

Speaker 2 - When we started Medicaid for the first time ever, there were some school districts that don't normally have a lot of applications, who were able, they didn't know household submitted any applications to them, and all of the free and reduced kids were directly

certified. So they actually did not have to do the verification process. And that was something that an outcome that we didn't expect. So there are some school districts that because they don't get any applications in because all of their kids are eligible for Direct Certification or the parents choose not to, because they don't have a lot of applications to process anyway. They don't have to do the verification process but they do have to complete the FNS 742. I just want to point that out. Speaker 1 - Our favorite report that, well, that's great that, you know, that that's a really good reason for folks to be really promoting the SNAP program and Medicaid and making sure that their households have access to it, because the more children you have directly certified the less verification that you have ahead you. So that was the last question that came in. Speaker 2 - Okay.

58:59

Speaker 1 - Uh, I said that too quickly. Question – Speaker 1 - I had one where somebody hit enter, just as a, just, as I said that. So let's say a student is directly certified with Reduced Medicaid, submits an application is approved for free meals, and selected for verification. They do not submit appropriate documentation for verification, do they go back to the status of reduced Medicaid?

59:25

Response – Speaker 2 - Yes, because they were directly certified, yes.

59:30

Speaker 1 - Alright, that was almost like a riddle. Well, thank you so much. That concludes the questions that we have. If you want to quickly type in any last-minute questions, as I mentioned, in the beginning, we will be answering those in writing and making that available, along with the recording and the transcript for this webinar. I just once again, want to thank my team for just being the amazing people they are. I don't know, if Fionnuala or Susan had any last words, you wanted to? You're like, nope, we didn't want to come back on the camera like everybody here. Good luck, and reach out to us if you need any technical support. With that, thank you so much. Thank you for joining us today and we look forward to continuing our work through this very adventurous school year we have.

1:00:22

Thank you.

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For more information, visit the Connecticut State Department of Education's Training for School Nutrition Programs webpage, or contact the school nutrition programs staff in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/Training/Verification_Process_Transcript.pdf.